

HONORABLE BARBARA J. ROTHSTEIN

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

SHANNON SPENCER, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

PROVIDENCE ST. JOSEPH HEALTH
FOUNDATION, a Washington nonprofit
corporation doing business as PROVIDENCE;
and DOES 1-20,

Defendants.

No. 2:23-CV-01723-BJR

**STIPULATED MOTION
FOR EXTENSION OF
TIME AND ORDER**

STIPULATION

Plaintiff, Shannon Spencer (“Plaintiff”), and Defendant, Providence St. Joseph Health Foundation (“Defendant”) (collectively, the “Parties”), by and through their respective undersigned attorneys, respectfully submit this Stipulated Motion for Extension of Time of the following deadlines.

Pursuant to Federal Rule of Civil Procedure 6(b), the Parties jointly request as follows:

1. For Plaintiff’s Motion to Remand, filed on July 25, 2024 (Dkt. No. 19):
 - a. To extend the deadline for Defendant to file its Opposition to Plaintiff’s Motion to Remand to September 18, 2024.
 - b. To extend the deadline for Plaintiff to file its Reply to Defendant’s

Opposition to Plaintiff's Motion to Remand to September 25, 2024.

2. For the FRCP 26(f) conference and initial disclosures:

a. To set the FRCP 26(f) conference deadline to October 16, 2024; and

b. To set the initial disclosure deadline to October 30, 2024.

The Parties privately mediated the matter on June 19, 2024, and recently arrived at a settlement in principle. The Parties respectfully request this extension of time to formalize the terms of their settlement agreement. This request is made to assist the Parties in facilitating a potential settlement and to provide them with the requisite time to prepare to meet the deadlines if this matter is not resolved.

DATED August 9, 2024

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Attorney for Defendant

CERTIFICATE OF SERVICE

I, Abigail D. Belscher, under penalty of perjury of the laws of the State of Washington, certify and declare that I caused a true and correct copy of the foregoing document to be served on the following parties on **August 9, 2024** as indicated below:

Patrick M. Madden Todd Nunn K&L Gates LLP 925 Fourth Avenue, Suite 2900 Seattle, WA 98104 Phone: (206) 370-5812 Email: Patrick.madden@klgates.com Email: Stephanie.pickett@klgates.com Email: Abigail.belscher@klgates.com <i>Attorneys for USNR, LLC</i>	<input type="checkbox"/> By United States Mail <input type="checkbox"/> By Legal Messenger <input checked="" type="checkbox"/> By Electronic CM/ECF <input type="checkbox"/> By Overnight Express Mail – Fed Ex <input type="checkbox"/> By Facsimile <input type="checkbox"/> By Email
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Dated this 9th day of August, 2024 at Seattle, Washington.

/s/ Abigail D. Belscher
Abigail D. Belscher, Sr. Practice Assistant

ORDER

Upon consideration of the Parties' Stipulated Motion for Extension, the Court finds that good cause exists to extend certain deadlines, and it is hereby **ORDERED** that the Motion is **GRANTED**.

It is **FURTHER ORDERED** that filing deadlines will be modified as follows.

Event	Current Date	New Date
Deadline for Defendant to Oppose Plaintiff's Motion to Remand	August 15, 2024	September 18, 2024
Deadline for Plaintiff to Reply to Defendant's Opposition to Plaintiff's Motion to Remand	August 22, 2024	September 25, 2024
FRCP 26(f) Conference	August 16, 2024	October 16, 2024
Initial Disclosure Deadline	August 30, 2024	October 30, 2024

The Joint Status Report is due November 6, 2024.

DATED this 12th day of August, 2024.


 HONORABLE BARBARA J. ROTHSTEIN